

Message

From: Mugdan.Walter@epamail.epa.gov [Mugdan.Walter@epamail.epa.gov]
Sent: 12/7/2010 3:58:55 PM
To: simon.paul@epa.gov
CC: Doug Garbarini [Garbarini.Doug@epamail.epa.gov]; Eric Schaaf [Schaaf.Eric@epamail.epa.gov]
BCC: Mugdan.Walter@epamail.epa.gov
Subject: Re: Capping metric

Doug G. and I spent 35-40 minutes looking through the GE document, and their numbers, to understand what they have done. Succinctly, my view is that what they have done in crunching these numbers is essentially meaningless.

From: Paul Simon/R2/USEPA/US
To: "Walter Mugdan" <Mugdan.Walter@epamail.epa.gov>, "Doug Garbarini" <Garbarini.Doug@epamail.epa.gov>
Cc: "Eric Schaaf" <Schaaf.Eric@epamail.epa.gov>
Date: 12/06/2010 06:46 PM
Subject: Capping metric

On the 2-pager GE gave us today, they say on p.2 that their 18% capping proposal corresponds to 7 nodes capped in a CU. But that doesn't seem to jibe with Connally's statement that if the total dredged area (not just the nodes under their control) is included in the denominator, their proposal is 14.4%. Does it? If an average of 10% of each CU (i.e., 4 nodes) is outside their control, that leaves 36 nodes. $18\% \times 36 = 6.48$ nodes.

In any case, it would be good if we could get them to confirm that if the total dredged area (not just the nodes under their control) is included in the denominator, their inventory capping proposal is 5%, not 6%.

If you want to talk to me tomow., pls email me or call my BB. 646-369-0047
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